

BAKER MARQUART LLP
 BRIAN E. KLEIN (258486) (bklein@bakermarquart.com)
 SCOTT M. MALZAHN (229204) (smalzahn@bakermarquart.com)
 2029 Century Park East, Suite 1600
 Los Angeles, CA 90067
 Telephone: (424) 652-7814
 Facsimile: (424) 652-7850

COOLEY LLP
 PATRICK E. GIBBS (183174) (pgibbs@cooley.com)
 JEFFREY M. KABAN (235743) (jkaban@cooley.com)
 3175 Hanover Street
 Palo Alto, CA 94304-1130
 Telephone: (650) 843-5355
 Facsimile: (650) 618-0387

COOLEY LLP
 DANIEL L. SACHS (294478) (dsachs@cooley.com)
 1299 Pennsylvania Ave. NW Suite 700
 Washington, DC 20004
 Telephone: (202) 728-7114
 Facsimile: (202) 842-7899
*Counsel for Defendant Dynamic Ledger
 Solutions, Inc., a Delaware Corporation*

Attorneys for Defendant
 DYNAMIC LEDGER SOLUTIONS, INC.,
 a Delaware Corporation

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ANDREW BAKER, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
 Delaware Corporation, THE TEZOS
 FOUNDATION, a Swiss foundation,
 KATHLEEN BREITMAN, an individual,
 ARTHUR BREITMAN, an individual,
 JOHANN GEVERS, an individual,
 STRANGE BREW STRATEGIES, LLC, a
 California limited liability company, and
 DOES 1 through 100 inclusive,

Defendant.

Case No. 3:17-cv-06850

**JOINT STIPULATION EXTENDING
 TIME FOR DEFENDANTS TO
 RESPOND TO COMPLAINT
 PURSUANT TO CIVIL L. R. 6-1(A)**

Judge: Hon. Edward M. Chen

1 Defendant Dynamic Ledger Solutions, Inc. (“DLS”) and plaintiff Andrew Baker (“Baker”)
 2 (collectively, the “Appearing Parties”) stipulate pursuant to Civil L. R. 6-1(a) to extend the time for
 3 DLS to respond to the putative class action complaint (the “Baker Complaint”) filed in the above-
 4 captioned action (the “Instant Action”) as follows:

5 WHEREAS, on October 25, 2017, Baker filed the Baker Complaint in the California Superior
 6 Court for the County of San Francisco (No. CGC-17-562144) alleging that DLS and other defendants,
 7 among other things, violated Sections 5 and 17(a) of the Securities Act of 1933, 15 U.S.C. § 77a *et*
 8 *seq.* (the “Securities Act”).

9 WHEREAS, on November 26, 2017, plaintiff GGCC, LLC, filed a putative class action
 10 complaint in the Northern District of California (the “GGCC Action”) alleging violations of the
 11 Securities Act based on the same transaction or occurrence as that described in the Baker Complaint.
 12 (No. 3:17-cv-06779) (N.D. Cal.). The GGCC Action has been assigned to the Honorable Richard
 13 Seeborg.

14 WHEREAS, on November 28, 2017, plaintiff Andrew Okusko filed a putative class action
 15 complaint in the Northern District of California (the “Okusko Action”) alleging violations of the
 16 Securities Act based on the same transaction or occurrence as that described in the Baker and GGCC
 17 Actions. (No. 3:17-cv-06829) (N.D. Cal.). The Okusko Action has been assigned to the Honorable
 18 Susan Illston.

19 WHEREAS, on November 29, 2017, DLS filed a Notice of Removal (“Notice”) of the Instant
 20 Action in this Court. The Notice identified the GGCC and Okusko Actions as related to the Instant
 21 Action.

22 WHEREAS, Securities Act claims brought as class actions pursuant to the Federal Rules of
 23 Civil Procedure are subject to the lead plaintiff provisions of the Private Securities Litigation Reform
 24 Act (“PSLRA”). *See* 15 U.S.C. § 77z-1. Such provisions, among other things, permit any prospective
 25 lead plaintiff to file an application for lead plaintiff within 60 days after a notice to prospective
 26 plaintiffs has been published, and direct courts to appoint a lead plaintiff and lead counsel for such
 27 actions within 90 days after such notice has been published. 15 U.S.C. § 77z-1(a)(3)(A)-(B).

28 WHEREAS, the PSLRA states that in the event that more than one class action has been filed

1 “asserting substantially the same claim or claims” and any party moves to consolidate the actions, the
 2 Court must decide any motion to consolidate such action before selecting lead counsel. 15 U.S.C. §
 3 77z-1(a)(3)(B)(ii).

4 WHEREAS, DLS anticipates moving to consolidate the GGCC, Okusko, and Instant Actions
 5 to the extent such actions remain in this Court.

6 WHEREAS, Baker anticipates filing in this court a timely motion to remand the Instant Action.

7 WHEREAS, in light of Baker’s anticipated motion to remand, the Appearing Parties met and
 8 conferred and agree that, to avoid the time and expense of premature, inefficient, and unnecessary
 9 motion practice, the deadline for the filing of an answer or motion to dismiss should be extended until
 10 after this Court’s ruling on the anticipated motion to remand.

11 WHEREAS, this extension will not alter the date of any event or any deadline already fixed
 12 by order of this Court.

13 NOW, THEREFORE, the Appearing Parties, hereby stipulate as follows:

14 DLS shall not be required to move or otherwise respond to the Baker Complaint filed in the
 15 Instant Action until 30 days after the Court rules on Baker’s anticipated motion to remand. Pursuant
 16 to Civil L. R. 6-1(a), this paragraph shall be effective upon the filing of this Stipulation with the Court.

17 **IT IS SO STIPULATED.**

18 Dated: November 30, 2017

BAKER MARQUART

19 **TAYLOR-COPELAND LAW**

21 /s/ James Q. Taylor-Copeland

22 James Q. Taylor-Copeland (284743)

23 *Counsel for Plaintiff Andrew Baker*

/s/ Brian E. Klein

Brian E. Klein (258486)

COOLEY LLP

/s/ Patrick E. Gibbs

Patrick E. Gibbs (183174)

Attorneys for Defendant
 DYNAMIC LEDGER SOLUTIONS, INC.,
 a Delaware Corporation

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, Patrick E. Gibbs hereby attests that concurrence in the filing of this document has been obtained from all the signatories above.

Dated: November 30, 2017

COOLEY LLP

/s/ Patrick E. Gibbs

Patrick E. Gibbs

PROOF OF SERVICE
(FRCP 5)

I am a citizen of the United States and a resident of the State of California. I am employed in Santa Clara County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley LLP, 3175 Hanover Street, Palo Alto, California 94304-1130. On the date set forth below I served the documents described below in the manner described below:

**JOINT STIPULATION EXTENDING TIME FOR DEFENDANTS
TO RESPOND TO COMPLAINT PURSUANT TO CIVIL L. R. 6-1(a)**



(BY U.S. MAIL) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Palo Alto, California.

James Q. Tayler-Copeland
501 W. Broadway, Suite 800
San Diego, CA 92102

Attorney for Plaintiff
Andrew Baker

Executed on November 30, 2017, at Palo Alto, California.

Brandie Giovannoni